

October 13, 2004

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WFIN-AM / WKXA-FM / WCSI-AM / WKKG-FM / WINN-FM / WWWY-FM / WRBI-FM

Re: Notice of Inquiry on Broadcast Localism

I represent, by today's standards, a small communications firm. We offer broadcast, newspaper, commercial print and internet services to our valued customers (listeners, readers, advertising partners - all - community citizens).

I am disturbed by what appears, on the part of the FCC and other special interest groups, to be an effort to suggest that radio falls short when it comes to serving "the interests and needs of their communities..."

Our radio stations format everything from country...to rock...to oldies...to news-talk. Make no mistake our success is measured by our ability to speak to our communities "between the records" (in the midst of various satellite programs on our NT stations).

Our stations regularly air and sponsor community events; 24/7 local news staff; political debate forums; emergency planning with local law enforcement agencies; provide incalculable amounts of air time to non-profit agencies; support and broadcast area high school sports activities; membership in area chamber of commerce; community development boards; local hospital boards; arts boards; civic clubs such as Rotary, etc...

One small example of our desire to be accountable to our local listeners is a program we call Taste Of Reality. We just presented this to students in our Findlay, Ohio and Batesville, Indiana markets.

This is where we collaborate with the business community and invite them to host a table for the day. In all, there are 19 tables.

When the students arrive in the gymnasium, they are guided through a series of life-choices that only they can make. They start by being told they are a 28 year-old adult, married and will probably have children.

From there, they are provided their dual monthly income, receive a checkbook, pay for college loans (depending upon career choice), submit taxes, purchase an automobile, housing along with insurance/utilities, groceries and yes, they even vote!

This program has been greatly appreciated by educators and they have actually added this to their curriculum in Indiana.

Making a difference in the communities in which we serve is not just a drill we do because we have to place an ascertainment report in the Public Inspection File each quarter. We do it because it's the right thing to do.

I am very proud of our associates, who are themselves local citizens who work and worship and want the best for their families.

We regard our responsibility to inform and entertain the local citizenry, to be an honor.

I certainly hope this NOI doesn't lead to more government intervention. I don't have the pleasure of spending public shareholder money. I report to a small group of owners and sure, they too are shareholders, but the paradigm is much different.

Respectfully submitted.